

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

*IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,*

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

**DECLARATION OF ANDRE M. MURA IN  
SUPPORT OF PLAINTIFFS' OPPOSITION  
TO DEFENDANTS' MOTION TO  
EXCLUDE PLAINTIFFS' EXPERTS'  
GENERAL CAUSATION OPINIONS FOR  
FAILURE TO ACCOUNT FOR SECTION  
230 AND THE FIRST AMENDMENT**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 I, Andre M. Mura, declare as follows:

2 I am a partner with the law firm Gibbs Mura LLP. I am duly admitted to practice before the  
3 courts of the State of California and in the Northern District of California. I am a Court-appointed  
4 member of the Plaintiffs' Steering Committee Leadership in *In re Social Media Adolescent*  
5 *Addiction/Personal Injury Products Litigation*, Case No. 4:22-MD-03047. I have personal  
6 knowledge of the following facts, and, if called as a witness, I could and would testify competently  
7 thereto.

8 1. Attached hereto as **Exhibit 1** is a true and correct copy of the May 16, 2025 Trial  
9 Report of Mitch Prinstein, Ph.D.

10 2. Attached hereto as **Exhibit 2** is a true and correct copy of the June 13, 2025 Expert  
11 Report of Dr. Emilio Ferrara.

12 3. Attached hereto as **Exhibit 3** is a true and correct copy of the June 13, 2025 Expert  
13 Report of Dr. Chris Mattmann.

14 4. Attached hereto as **Exhibit 4** is a true and correct copy of the July 9, 2025 Expert  
15 Report of Sandeep Chatterjee, Ph.D.

16 5. Attached hereto as **Exhibit 5** is a true and correct copy of the July 9, 2025 Expert  
17 Report of Michael Baiocchi, Ph.D.

18 6. Attached hereto as **Exhibit 6** is a true and correct copy of the April 18, 2025 Expert  
19 Report of Dr. Randy Auerbach.

20 7. Attached hereto as **Exhibit 7** is a true and correct copy of Exhibit 25 to the  
21 Deposition of Brian Boland.

22 I declare under penalty of perjury under the laws of the United States that the foregoing is  
23 true and accurate.

24 DATED: November 7, 2025

By: /s/ Andre M. Mura